

UNITED STATES DISTRICT COURT  
DISTRICT OF SOUTH DAKOTA  
SOUTHERN DIVISION

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UNITED STATES OF AMERICA,

CR 19-40015

Plaintiff,

FACTUAL BASIS STATEMENT

vs.

PAUL ERICKSON,

Defendant.

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Defendant states that the following facts are true, and the parties agree that they establish a factual basis for the offense to which Defendant is pleading guilty pursuant to Fed. R. Crim. P. 11(b)(3):

My name is Paul Erickson and I am a resident of Sioux Falls.

I solely operated a business venture to develop land in the Bakken oil fields in North Dakota. Through my business, I became acquainted with several individuals with whom I developed strong professional and personal relationships. I approached many of those individuals about investing in my business. However, I falsely represented to investors that I would use the money to purchase real estate and the construction of single-family homes in North Dakota, which I did not do.


On March 1, 2017, I accepted a \$100,000 wire transfer from D.G. that was deposited into my Wells Fargo bank account. This was supposed to be an investment in my business. I represented to D.G. that the money would be used

for the development of real estate in North Dakota and that the amount would be repaid no later than August 28, 2017. My representations to D.G. caused him to wire transfer \$100,000 to my Wells Fargo bank account on March 1, 2017. However, I did not invest the money from D.G. into the Bakken oil fields venture and I did not repay D.G. any of the money he paid me. All of this occurred in violation of 18 U.S.C. § 1343, as alleged in Count 1 of the Indictment.


Furthermore, from the \$100,000 I received from D.G. on March 1, 2017, I conducted a financial transaction and transferred \$1,000 to M.B., as alleged in Count 8 of the Indictment. All of this occurred in violation of 18 U.S.C. § 1956(a)(1)(A)(i), as alleged in Count 8 of the Indictment.

RONALD A. PARSONS, JR.  
United States Attorney

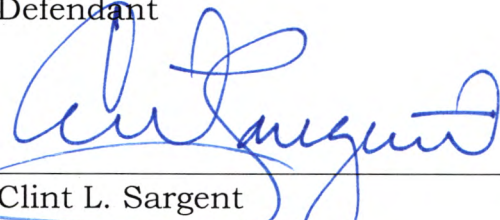
November 8, 2019  
Date

  
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11/15/19  
Date

  
Paul Erickson  
Defendant

11-15-19  
Date

  
Clint L. Sargent  
Attorney for Defendant